

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8, MONTANA OFFICE FEDERAL BUILDING, 10 West 15<sup>th</sup> St., Suite 3200 HELENA, MONTANA 59626

Ref: 8MO

July 13, 2011

Mary C. Erickson, Supervisor Gallatin National Forest 10 East Babcock Street P.O. Box 130 Bozeman, MT 59771

Re: CEQ 20110167; Bozeman Municipal Watershed

Project Final Supplemental EIS

Dear Ms. Erickson:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the latest May 2011 Final Supplemental Environmental Impact Statement (FSEIS) for the Bozeman Municipal Watershed Project in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act.

As stated in prior comments, the EPA supports the Gallatin National Forest's efforts to further reduce potential impacts to water quality from the proposed Bozeman Municipal Watershed Project. We are supportive of the project purpose and need to reduce hazardous fuels and fire risk/severity in the municipal watershed for the City of Bozeman to reduce the risk of excess sediment and ash reaching the municipal water treatment plant, as well as to reduce fire risk/severity to the wildland urban interface (WUI), and increase firefighter and public safety in the event of a wildfire.

We recognize that land management decisions involve environmental and resource management trade-offs (i.e., trade-offs in impacts among vegetation treatments, fire and fuels, water quality and aquatics, wildlife, and other resource impacts). The Gallatin National Forest appears to have considered the long term trade-offs associated with potentially severe wildfire and high sediment increase risk in comparison to the impacts of implementing the vegetation management activities in this proposal, and the possible short-term increases in sediment to the City of Bozeman water treatment plant.

We are pleased that the Gallatin NF continues to coordinate with the Montana Dept. of Environmental Quality (MDEQ) in making project modifications, and that the MDEQ has affirmed project water quality best management practices (BMPs), and has indicated that the project is consistent with Montana water quality regulations. We are also pleased that the FSEIS states that the preferred alternative, Alternative 6, meets all applicable water quality laws, regulations and Forest Plan Guidance for Bozeman Creek and Hyalite Creek, and that all required water quality permits would be acquired by the Gallatin National Forest prior to any ground disturbance activities for the project.

We are pleased that the Gallatin NF decommissioned about 19 miles of roads in the Hyalite drainage and obliterated about five miles of unauthorized user made roads and ATV routes that were eroding and potential sediment sources to Hyalite Creek. Road BMP improvements and decommissioning of roads that are sediment sources to streams help reduce sediment loads to streams and are an important component of maintaining aquatic health in forest watersheds.

The EPA appreciates the opportunity to review and comment during the NEPA process for this project. If you have any questions regarding our input please contact Mr. Steve Potts of my staff in Missoula at 406-329-3313 or in Helena at (406) 457-5022. Thank you for your consideration.

Sincerely,

Julie A. DalSoglio

Director

Montana Office

cc: Suzanne Bohan, EPA, 8EPR-N, Denver Mark Kelley/Robert Ray, MDEQ, Helena

Teri Seth, Gallatin National Forest, Bozeman Ranger District